

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IAN J. BROWN, JAMES BROWN, and)
BARBARA BROWN,)

Plaintiffs,)

v.)

UNITED STATES OF AMERICA,)
VERIZON NEW ENGLAND, INC., and)
BOSTON EDISON COMPANY d/b/a/)
NSTAR ELECTRIC,)

Defendant .)

C.A. No. 04cv11924-RGS

MOTION FOR CONTINUANCE OF MOTION HEARING

The United States respectfully requests that the Court continue the hearing on the government's Motion to Dismiss, currently scheduled for February 11, 2005, to a future date. The United States requests this continuance because AUSA Damian W. Wilmot, lead attorney for the United States in this matter, will be out of the State on business from February 7, 2005, until February 18, 2005. AUSA Wilmot is also unavailable on February 25, 2005, due to a conference in the Worcester federal courthouse, and on February 22, 2005, and March 8, 9, 15 and 16, 2005, due to scheduled depositions in other actions. Attorney Scott E. Charnas, counsel for the Plaintiff, does not oppose this Motion and is unavailable the week of February 28, 2005, and the week of March 7, 2005. Also, attorney William A. Worth, counsel for Verizon New England, Inc., does not oppose this Motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Damian W. Wilmot
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Dated: February 3, 2005